

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Case No.: 19-23649 (RDD)

Purdue Pharma L.P., et al.

Chapter 11

Debtors¹

(Jointly Administered)

MOTION FOR LEAVE TO FILE *AMICI CURIAE* BRIEF

Proposed *amici curiae* The Kennedy Forum, American Foundation for Suicide Prevention, Depression and Bipolar Support Alliance, Inseparable, The Jed Foundation, Kennedy-Satcher Center for Mental Health Equity, Mental Health America, National Alliance on Mental Illness, National Association of Addiction Treatment Providers, National Council for Behavioral Healthcare, National Association for Behavioral Healthcare, Scattergood Foundation, and Well Being Trust (collectively “*amici*”) respectfully request leave of this Court to submit the attached *amici curiae* brief.

Amici are nonprofit organizations concerned about and involved in addressing the public health crisis attributable to opioid addiction.² Their proposed brief, informed by their deep experience in the field, supports the Fifth Amended Joint Chapter 11 Plan of Reorganization of

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014).

² No *amici* has a parent corporation. No *amici* issues stock. Hence, no publicly held corporation holds 10% or more of an *amici*’s stock.

Purdue Pharma L.P. and Its Affiliated Debtors filed on June 3, 2021, and its intent that governments use distributions to supplement rather than supplant spending to abate the opioid crisis. It also urges governments to put in place protections, like those in New York, to ensure that distributions are used to supplement rather than supplant current spending.

Amici believe their proposed brief is timely and will be useful to this Court and the parties. *Amici* are not litigants and have no direct stake in the many judicial proceedings related to the opioid epidemic.

The proposed *amici* brief does not duplicate arguments or information presented by others in this proceeding. It offers “a unique perspective” and “specific information.” *Voices for Choices v. Illinois Bell Telephone Co.*, 339 F.3d 542, 545 (7TH Cir. 2003) (discussing the appropriateness of *amici* briefs).

Accordingly, the proposed *amici* respectfully request that the Court grant leave to file the attached brief.³

Respectfully submitted,

/s/
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³ No party or party’s counsel authored the attached brief in whole or in part. No person other than the *amici* or its counsel contributed money to fund the preparation or submission of the brief